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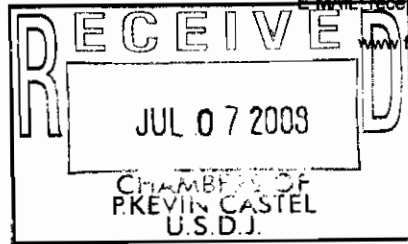
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MEMO ENDORSED



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July 1, 2008

344-07/DPM/MAM

BY HAND

Hon. P. Kevin Castel
 United States District Judge
 United States Courthouse
 500 Pearl Street, Room 2260
 New York, New York 10007-1312

Re: American Steamship Owners v. Dusung Shipping Co. Ltd.
 07 CV 6474 (PKC)

*Time to serve process under
 the Hague Convention is extended through
 September 11, 2008 - SO ORDERED.*

[Signature]
 USDJ

7-11-08

Dear Judge Castel:

We represent the Plaintiff in the above-referenced action involving, *inter alia*, a maritime attachment under Rule B and write to request that the pre-trial conference scheduled for July 11, 2008 be adjourned 60 days. We also write to request that the Court extend Plaintiff's time to serve process via the Hague Convention up to and including September 11, 2008. In so doing, we withdraw our application of May 7, 2008 requesting that the Court grant Plaintiff leave to serve process by alternative means pursuant to Rule 4(f)(3).

By way of background, Plaintiff filed this action on July 17, 2007 seeking, *inter alia*, to attach the sum of \$394,031 from Defendant Dusung Shipping Co. Ltd. (among other Defendants). On the same day, Your Honor granted Plaintiff's application for the issuance of Process of Maritime Attachment and Garnishment ("PMAG"). On or about August 20, 2007, Plaintiff attached the sum of \$20,000 and Notice of Attachment was provided on the same date to Dusung via e-mail and fax on the same date. On February 1, 2008, Plaintiff attached an additional \$175.00 from Dusung and Notice of Attachment was given via e-mail and fax on the same date. To date, Defendants have not appeared in the action or moved to vacate the attachments although prior Notices of Pre-Trial Conference have been sent via electronic mail to the address dusung2000@hanmail.net.

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July 1, 2008
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As we advised the Court on May 7, 2008, on April 23, 2008, the Korean Central Authority informed us that it could not effect service of process upon the Defendants because they have moved from their previous address, which was the last known business address for Defendants Plaintiff possessed. We also informed the Court that Plaintiff's Korean counsel had located Defendants' new address at Room 501, Dusung Bldg, 1357-18, Seocho-dong, Seocho-ku, Seoul, 137-862, Korea. On May 8, in response to Plaintiff's request to permit Plaintiff to serve process by alternative means at this new address, Your Honor directed, *inter alia*, as follows: "I will require an affidavit or declaration by a person with knowledge of the facts setting forth the factual basis to believe that defendant can be found at the so-called 'new address.'" For the Court's easy reference, we annex as Exhibit A hereto a copy of the Court's Memo Endorsed Order of May 8, 2008.

Pursuant to Your Honor's directive, Plaintiff's hereby submits the Declaration of Mr. Dongsoo Lee, the individual who personally investigated Defendant Dusung's whereabouts in Korea. Mr. Lee confirms that Defendant Dusung is currently doing business at the above address. (See Exhibit B).

Finally, on May 13, 2008, we forwarded to the Korean Central Authority, Requests for Service Abroad of Judicial and Extrajudicial Documents for each of the Defendants, with each such Request identifying the new address. The Korean Central Authority received the Requests on May 16, 2008. (See Exhibit C). As result, Plaintiff's hereby withdraws its application for leave to serve by alternative means and respectfully requests a 60-day extension of time to serve the Summons and Complaint through the Korean Central Authority. Upon receipt of the Certificate of Service from the Korean Central Authority we shall file same with the Court.

In light of the foregoing, we respectfully request that the Court grant the within application.

We thank the Court for its attention to this matter.

Respectfully yours,
FREEHILL HOGAN & MAHAR LLP


Manuel A. Molina